

**UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

-VS-

MARCUS PRINCE

**CRIMINAL COMPLAINT**

CASE NUMBER: 3:06-mj-107

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

**Count 1:** On or about and between July 7, 2006 and July 26, 2006, in Lackawanna County, in the Middle District of Pennsylvania, the defendant, *Marcus Prince*, used a facility and means of interstate and foreign commerce, to knowingly attempt to persuade, entice, and induce any individual who has not attained the age of 18 years, for the purpose of engaging in sexual acts as defined in Title 18, United States Code, Section 2246, and the sexual acts would be a violation of chapter 109A of Title 18, to wit, Title 18, United States Code, Section 2243(a), if the sexual acts occurred in the special maritime and territorial jurisdiction of the United States, in violation of Title 18, United States Code, Section 2422(b).

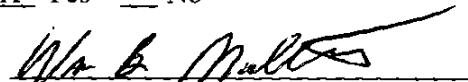
**Count 2:** On or about and between July 27, 2006 and July 29, 2006, in Lackawanna County, in the Middle District of Pennsylvania, the defendant, *Marcus Prince*, used a facility and means of interstate and foreign commerce, to knowingly attempt to persuade, entice, and induce any individual who has not attained the age of 18 years, for the purpose of engaging in sexual acts as defined in Title 18, United States Code, Section 2246, and the sexual acts would be a violation of chapter 109A of Title 18, to wit, Title 18, United States Code, Section 2243(a), if the sexual acts occurred in the special maritime and territorial jurisdiction of the United States, in violation of Title 18, United States Code, Section 2422(b).

**Count 3:** On or about and between July 7, 2006 to on or about July 28, 2006, in Lackawanna County, in the Middle District of Pennsylvania, and elsewhere, the defendant, *Marcus Prince*, did willfully and knowingly transport and ship, in interstate commerce via computer and the internet, visual depictions of minors engaged in sexually explicit conduct that had been transmitted and transported in interstate commerce by means of a computer, and the production of such depictions involved the use of a minor engaging in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252(a)(1).

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT**

Continued on the attached sheet and made a part hereof. ☒ Yes ☐ No

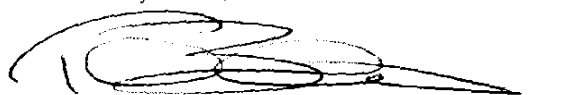
  
Signature of Complainant

Sworn to before me, and subscribed in my presence

7/31/06 at  
Date

Scranton, Pennsylvania  
City and State

Thomas M. Blewitt, U.S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer